

# **EXHIBIT 3**

**UNITED STATES DISTRICT COURT  
SOUTHERNDISTRICTOFNEWYORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No.24-cv-06563-LJL

**DEFENDANT'S  
RULE26(A) INITIAL DISCLOSURES**

Pursuant to Rule26(a)(1) of the Federal Rules of Civil Procedure, Defendant, Rudolph W. Giuliani ("Defendant"), makes the following initial disclosures:

A. Witnesses

The following individuals are likely to have discoverable information that Defendant may use to support his defense in this action:

1. Rudolph W. Giuliani  
c/o Kenneth Caruso Law LLC  
15 W. 72<sup>nd</sup> Street  
New York, NY 10023  
(646) 599-4970  
[ken.caruso@kennethcarusolaw.com](mailto:ken.caruso@kennethcarusolaw.com)

Subject: Defendant possesses personal knowledge regarding the matters raised in the pleadings and motions in this action, including his intention to make Florida his permanent residence and his actions that corroborate and manifest that intent. Defendant also has knowledge as to the facts contained in his cross-motion for summary judgment [ECF41], as well

as his declaration [ECF42] and the accompanying exhibits annexed thereto [ECF42-1-42-9]. Those materials are hereby incorporated by reference.

B. Documents and Tangible Things

The following is a description by category and location of all documents, electronically stored information, and tangible things in Defendant's possession, custody, or control that Defendant may use to support his defense:

1. Exhibit A to Defendant's Cross-Motion for Summary Judgment (ECF42-1);
2. Exhibit B to Defendant's Cross-Motion for Summary Judgment (ECF42-2);
3. Exhibit C to Defendant's Cross-Motion for Summary Judgment (ECF42-3);
4. Exhibit D to Defendant's Cross-Motion for Summary Judgment (ECF42-4);
5. Exhibit E to Defendant's Cross-Motion for Summary Judgment (ECF42-5);
6. Exhibit F to Defendant's Cross-Motion for Summary Judgment (ECF42-6);
7. Exhibit G to Defendant's Cross-Motion for Summary Judgment (ECF42-7);
8. Exhibit H to Defendant's Cross-Motion for Summary Judgment (ECF42-8);
9. Exhibit I to Defendant's Cross-Motion for Summary Judgment (ECF42-9); and
10. The videos referred to in the Declaration of David Labkowski, Esq. in Support of Defendant's Cross-Motion for Summary Judgment [ECF43¶¶5-99].

11. All of the foregoing materials are hereby incorporated by reference.

Dated: November 3, 2024  
New York, New York

Respectfully Submitted,  
  
KENNETH CARUSO LAW LLC

By: /s/ Kenneth A. Caruso  
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LABKOWSKI LAW, P.A.

By: /s/ David Labkowski

David Labkowski

250 95<sup>th</sup> Street, Unit #547233

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*Attorneys for Defendant,*

*Rudolph W. Giuliani*

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

RUBY FREEMAN and WANDREA' MOSS,

Plaintiffs,

v.

RUDOLPH W. GIULIANI,

Defendant.

No. 24cv-06563-LJL

**DEFENDANT'S  
RULE 26(A) INITIAL DISCLOSURES**

Pursuant to Rule 26(a)(1) of the Federal Rules of Civil Procedure, Defendant, Rudolph W. Giuliani ("Defendant"), makes the following initial disclosures:

A. Witnesses

The following individuals are likely to have discoverable information that Defendant may use to support his defense in this action

1. Rudolph W. Giuliani  
c/o Kenneth Caruso Law LLC  
15 W. 72nd Street  
New York, NY 10023  
(646) 599-4970  
ken.caruso@kennethcarusolaw.com

Subject: Defendant possesses personal knowledge regarding the matters raised in the pleadings and motions in this action, including his intent to make Florida his permanent residence and his actions that corroborate and manifest that intent. Defendant also has knowledge as to the facts contained in his cross-motion for summary judgment [ECF 41] as well as his declaration [ECF 42] and the accompanying exhibits annexed thereto [ECF 42-1–42-9]. Those materials are hereby incorporated by reference.

B. Documents and Tangible Things

The following is a description by category and location of all documents, electronically stored information, and tangible things in Defendant's possession, custody, or control that Defendant may use to support its defense:

1. Exhibit A to Defendant's Cross-Motion for Summary Judgment (ECF-42;
2. Exhibit B to Defendant's Cross-Motion for Summary Judgment (ECF-42;
3. Exhibit C to Defendant's Cross-Motion for Summary Judgment (ECF-42;
4. Exhibit D to Defendant's Cross-Motion for Summary Judgment (ECF-42;
5. Exhibit E to Defendant's Cross-Motion for Summary Judgment (ECF-42;
6. Exhibit F to Defendant's Cross-Motion for Summary Judgment (ECF-42;
7. Exhibit G to Defendant's Cross-Motion for Summary Judgment (ECF-42;
8. Exhibit H to Defendant's Cross-Motion for Summary Judgment (ECF-42;
9. Exhibit I to Defendant's Cross-Motion for Summary Judgment (ECF-42; and
10. The videos referred to in the Declaration of David Labkowski, Esq. in Support of Defendant's Cross-Motion for Summary Judgment [ECF 43 ¶ 599].

11. All of the foregoing materials are hereby incorporated by reference.

Dated: November 3, 2024  
New York, New York

Respectfully Submitted,

KENNETH CARUSO LAW LLC

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